

Exhibit 18

1 UNITED STATES DISTRICT COURT

2 WESTERN DISTRICT OF NEW YORK

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4 **BLACK LOVE RESISTS IN THE RUST, ET AL.,**
5 **INDIVIDUALLY AND ON BEHALF OF A CLASS OF**
6 **ALL OTHERS SIMILARLY SITUATED,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., ET AL.,**

10 Defendants.
11 -----

12 **EXAMINATION BEFORE TRIAL**

13 **OF BYRON LOCKWOOD**

14 **APPEARING REMOTELY FROM**

15 **BUFFALO, NEW YORK**

16
17 August 10, 2023

18 At 11:00 a.m.

19 Pursuant to notice
20

21 REPORTED BY:

22 Rebecca L. DiBello, RPR, CSR(NY)

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

DEPAOLO CROSBY REPORTING SERVICES, INC.

135 Delaware Avenue, Suite 301, Buffalo, New York 14202
716-853-5544

R E M O T E A P P E A R A N C E S

APPEARING FOR THE PLAINTIFFS, BLACK LOVE
RESISTS IN THE RUST, ET AL., INDIVIDUALLY AND
ON BEHALF OF A CLASS OF ALL OTHERS SIMILARLY
SITUATED:

**NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE**

BY: CLAUDIA WILNER, ESQ.

275 Seventh Avenue, Suite 1506
New York, New York 10001
(212) 633-6967

APPEARING FOR THE DEFENDANTS, **CITY OF BUFFALO,
N.Y., et al.:**

HODGSON RUSS LLP

BY: PETER SAHASRABUDHE, ESQ.

And HUGH RUSS, ESQ.,

140 Pearl Street
Buffalo, New York 14202
(716) 848-1508

ALSO PRESENT: Cheyenne Freeley, Hodgson Russ
Anjana Malhotra

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—BYRON LOCKWOOD—

1 just verbally.

2 Q. What caused you to express your
3 dissatisfaction with the practice?

4 A. I just didn't like it.

5 Q. Was there a particular event that occurred
6 that prompted you to say something?

7 A. No.

8 Q. And what did you say?

9 A. I just said I don't think it's necessary to
10 give a ticket for each dark tinted window.

11 Q. And did anything happen after you said that?

12 A. No. I don't think so. Mentioned it to the
13 chief and the commissioner and I don't know if
14 they took it up with them or not. I just
15 mentioned it.

16 Q. Did you check to see whether the multiple
17 tinted windows ticketing practices were
18 continuing after this after you mentioned it?

19 MR. SAHASRABUDHE: Objection to form.

20 A. No. I didn't check into it because I know
21 that it was something that they can do. It
22 wasn't illegal what they were doing. It was
23 just that I didn't -- me particularly didn't

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—BYRON LOCKWOOD—

1 care for it.

2 Q. Well, regardless of whether it was legal,
3 couldn't you direct the officers not to do it?

4 MR. SAHASRABUDHE: Objection to form.

5 A. I'm not going to direct the officer not to do
6 his job. If it's part of his job then he's
7 going to do what he's going to do as long as
8 it was part of the job.

9 Q. So it's your testimony that issuing four
10 tinted windows tickets in a single stop is
11 part of the officer's job?

12 MR. SAHASRABUDHE: Objection to form.
13 That's not what he said.

14 A. It's legal. It's part of the V&T so they can
15 do it. So it's part of their job. They can
16 do that.

17 Q. Were you aware that the Strike Force and the
18 Housing Unit engaged in more multiple
19 ticketing than other units of the BPD?

20 MR. SAHASRABUDHE: Objection to form.

21 A. I know they issued a lot of tickets, but I
22 didn't measure their writings compared to
23 traffic or the districts.

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1 STATE OF NEW YORK)

2 COUNTY OF ERIE)

3
4 I, Rebecca Lynne DiBello, CSR, RPR, Notary
5 Public, in and for the County of Erie, State of
6 New York, do hereby certify:

7 That the witness whose testimony appears
8 hereinbefore was, before the commencement of
9 their testimony, duly sworn to testify the
10 truth, the whole truth and nothing but the
11 truth; that said testimony was taken pursuant
12 to notice at the time and place as herein set
forth; that said testimony was taken down by me
and thereafter transcribed into typewriting,
and I hereby certify the foregoing testimony is
a full, true and correct transcription of my
shorthand notes so taken.

13 I further certify that I am neither counsel
14 for nor related to any party to said action,
15 nor in anyway interested in the outcome
thereof.

16 IN WITNESS WHEREOF, I have hereunto
17 subscribed my name and affixed my seal this
18 26th day of August, 2023.

19 

20 -----
21 Rebecca Lynne DiBello, CSR, RPR
22 Notary Public - State of New York
23 No. 01D14897420
Qualified in Erie County
My commission expires 5/11/2027

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